

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
BOSTON
HOUSTON
LOS ANGELES
HANOI
HO CHI MINH CITY
ATLANTA

Duane Morris®

FIRM and AFFILIATE OFFICES

GREGORY P. GULIA
DIRECT DIAL: 212.692.1027
PERSONAL FAX: 212.202.6014
E-MAIL: gpgulia@duanemorris.com

www.duanemorris.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/7/2021

NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS

MEXICO CITY
ALLIANCE WITH
MIRANDA & ESTAVILLO

May 27, 2021

BY ECF AND EMAIL

(Torres_NYSDChambers@nysd.uscourts.gov)

Hon. Analisa Torres
United States District Court Southern District of
New York
500 Pearl Street
New York, NY 10007-1312

Re: *Cardiovascular Research Foundation v. The Medical College of Wisconsin, Inc. et al*
(Civil Action No.: 1:21-cv-02967 (AT))

Dear Judge Torres:

We submit this letter on behalf of plaintiff Cardiovascular Research Foundation ("Plaintiff") and defendants Medical College of Wisconsin, Inc., American Society for Transplantation and Cellular Therapy and National Marrow Donor Program doing business as Center for International Blood and Marrow Transplant Research (collectively, "Defendants") ("Plaintiff" and "Defendants" are hereinafter collectively referred to as the "Parties"), to respectfully request that Your Honor adjourn the Initial Pre-Trial Conference scheduled for June 8, 2021 and extend the deadlines set forth in the Court's Orders dated April 20, 2021 by 30 days as proposed below:

Event	Current Deadline	Proposed Deadline
Parties' Joint Letter and jointly proposed Case Management Plan and Scheduling Order	June 1, 2021	July 1, 2021

Event	Current Deadline	Proposed Deadline
Parties must indicate whether they consent or decline to have this case tried before a Magistrate	June 1, 2021	July 1, 2021
Initial Pretrial Conference, in accordance with Rule 16 of the Federal Rules of Civil Procedure	June 8, 2021 at 10:40 a.m.	July 8, 2021

This request is the Parties' first request to extend the aforementioned deadlines. This request is sought on the grounds that the Parties are currently engaged in settlement discussions, but require some additional time to negotiate a settlement. The requested extension is not being sought for the purpose of delay, but so that the Parties can negotiate the terms of settlement and finalize and execute a settlement agreement.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

/s/ Gregory P. Gulia
Gregory P. Gulia

GPG:slj

cc: Counsel of Record

GRANTED. The Court adopts the joint proposed schedule. The initial pretrial conference scheduled for June 8, 2021, is ADJOURNED to **July 8, 2021, at 10:40 a.m.**

SO ORDERED.

Dated: June 7, 2021
New York, New York



ANALISA TORRES
United States District Judge